

# Devens, Lo, Nakano, Saito, Lee & Wong

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November 14, 1997

VIA FAX (202) 219-3923  
AND REGULAR MAIL

Nancy E. Bell, Esq.  
General Counsel  
Federal Election Commission  
999 E. Street NW  
Washington, D.C. 20463

Re: MUR 4594/Longevity International Enterprises Corp.

Dear Ms. Bell:

We are in receipt of your letter dated November 14, 1997. First, in your letter it is stated that Longevity's response is due on November 28, 1997 yet in the second paragraph it states that Longevity has thirty (30) days from the date of the letter to respond. Please clarify this since if Longevity has thirty (30) days from the date of the notification, if Longevity chooses to respond, it seems to us that the responses would be due by December 14, 1997.

Second, we believe our client is interested in avoiding any further legal action to comply with the subpoena if some type of resolution can be reached. Your letter indicated that if our client is interested in discussing the scope and substance of the subpoena to contact you. We therefore would like to explore the possibility since we obviously have some difficulty in the scope of some of the documents being requested.

1. First, in your request for documents, you are requesting documents from 1981 to 1996 which means a fifteen year period. If we can limit the scope of this, our client may be willing to review what to produce since it is inconceivable to us how you can be requesting documents going back over 15 years when the limitation period in this matter would be five years.

2. In document request number 4, you request all documents for Hsu Chun-I, Louis Chang and Karl Wang. We are not sure over what period of time this relates to and what the scope is exactly of what you're looking for. Our understanding is that these individuals were the general manager or operations manager of Longevity. So for example, if Mr. Chang signed a requisition order

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OFFICE OF GENERAL  
COUNSEL

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Nancy E. Bell, Esq.

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for supplies, it seems that you would want this document. If you are also insisting on the 15 year period, you may also be talking about a tremendous amount of documents to be copied. If there is some way that this can be limited as to exactly what you are looking for as it relates to these individuals, Longevity may consider producing such documents.

Also, if you still are insisting on producing documents for this 15 year period, we are not sure how many documents there are in existence but given this length of time there may be substantial documents. We are then talking about mailing these documents to Washington D.C. The copying and mailing costs may be substantial and if there is some way they can be produced at some local Federal Office, please advise us so.

Again, our client is exploring its options but since your letter stated if our client is interested in discussing matters, we certainly would like to discuss matters and see if a possible compromise could be reached over this situation.

Very truly yours,

DEVENS, LO, NAKANO,  
SAITO, LEE & WONG



By

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Thomas J. Wong

TJW:11

cc: Longevity International  
Enterprise Corp.

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